UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

NEW MEXICO UNITED FOOD AND COMMERCIAL WORKERS UNION'S AND EMPLOYERS' HEALTH AND WELFARE TRUST FUND, on behalf of itself and all others similarly situated,

Plaintiff,

v.

PURDUE PHARMA L.P., PURDUE PHARMA, INC., THE PURDUE FREDERICK COMPANY, INC. d/b/a THE PURDUE FREDERICK COMPANY, P.F. LABORATORIES, INC., ABBOTT LABORATORIES, ABBOTT LABORATORIES, INC., MICHAEL FRIEDMAN, HOWARD R. UDELL, PAUL D. GOLDENHEIM, JOHN DOE Nos. 1 through 20, and JANE DOE Nos. 1 through 20,

Defendants.

Civil Action No. 07-cv-6916-JGK

MOTION TO ADMIT COUNSEL ART SADIN PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Christopher A. Seeger, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of:

> Art Sadin Sadin Law Firm, PC 121 Magnolia, Ste. 102 Friendswood, Texas 77546 Telephone: (281) 648-7711

Fax: (281) 648-7799

Art Sadin is a member in good standing of the State Bar of Texas. There are no pending disciplinary proceedings against him in any State or Federal Court. Attached hereto as Exhibit 1 is Mr. Sadin's Affidavit, with Exhibit A, an original Certificate of Good Standing from the State Bar of Texas, attached thereto.

Dated: November ______, 2007

Respectfully Submitted,

SEEGER WEISS LLP

Christopher A. Seeger (CS-4880)

One William Street New York, NY 10004

Telephone: (212) 584-0700 Facsimile: (212) 584-0799

Counsel for Plaintiff and the Class

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

NEW MEXICO UNITED FOOD AND COMMERCIAL WORKERS UNION'S AND EMPLOYERS' HEALTH AND WELFARE TRUST FUND, on behalf of itself and all others similarly situated, Plaintiff,))) Civil Action No. 07-cv-6916 -JGK))
PURDUE PHARMA L.P., PURDUE PHARMA, INC., THE PURDUE FREDERICK COMPANY, INC. d/b/a THE PURDUE FREDERICK COMPANY, P.F. LABORATORIES, INC., ABBOTT LABORATORIES, ABBOTT LABORATORIES, INC., MICHAEL FRIEDMAN, HOWARD R. UDELL, PAUL D. GOLDENHEIM, JOHN DOE Nos. 1 through 20, and JANE DOE Nos. 1 through 20,	AFFIDAVIT OF CHRISTOPHER A. SEEGER IN SUPPORT OF MOTION TO ADMIT COUNSEL ART SADIN PRO HAC VICE
Defendants.)
State of New York))ss:	
County of New York)	

Christopher A. Seeger, being duly sworn, hereby deposes and says as follows:

- I am a member of Seeger Weiss LLP, counsel for Movant, New Mexico United Food and Commercial Workers Union's and Employers' Health and Welfare Trust Fund ("Movant"), in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Movant's motion to admit Art Sadin as counsel *pro hac vice* to represent Movant in this matter.
- 2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1990. I am also admitted to the bar of the United

States District Court for the Southern District of New York, and am in good standing with this Court.

- 3. I have known Art Sadin since 2006.
- 4. Mr. Sadin is an associate with my firm.
 - 5. I have found Mr. Sadin to be a skilled attorney and a person of integrity. He is experienced in federal practice and is familiar with the Federal Rules of Civil Procedure.
 - 6. Accordingly, I am pleased to move the admission of Art Sadin, *pro hac vice*.
 - 7. I respectfully submit a proposed order granting the admission of Art Sadin, *pro hac vice*, which is attached hereto.

WHEREFORE, it is respectfully requested that the motion to admit Art Sadin, *pro hac vice*, to represent Movants in the above-captioned matter, be granted.

Christopher A. Seeger

Sworn before me this $q^{\tau H}$ day of November, 2007

NOTARY PURLIC

Jose D. Mora
Notary Public State of New York
No. 03-6062383 Qualified in Bronx County
Certificate Filed in New York County
Commission Expires August 6, 2009

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

NEW MEXICO UNITED FOOD AND COMMERCIAL WORKERS UNION'S AND EMPLOYERS' HEALTH AND WELFARE TRUST FUND, on behalf of itself and all others similarly situated,))) Civil Action No. 07-cv-6916-JGK)
Plaintiff,)
V))
PURDUE PHARMA L.P., PURDUE PHARMA,) }
INC., THE PURDUE FREDERICK COMPANY,)
INC. d/b/a THE PURDUE FREDERICK)
COMPANY, P.F. LABORATORIES, INC.,)
ABBOTT LABORATORIES, ABBOTT)
LABORATORIES, INC., MICHAEL FRIEDMAN,)
HOWARD R. UDELL, PAUL D. GOLDENHEIM,) \
JOHN DOE Nos. 1 through 20, and JANE DOE Nos.	<i>)</i>)
1 through 20,)
Defendants.)
Defendants.	<i>)</i>

- I, Art Sadin, Esquire, an associate of the Sadin Law Firm, PC, in Friendswood, Texas, declare the following under penalty of perjury:
- 1. I am a member in good standing of the State Bar of Texas and am admitted to practice before the United States District Courts for the Southern District of Texas. I have never been disciplined, suspended or disbarred by these or any other Court.
- 2. Attached hereto is a Certificate attesting to my admission date and that I am a member in good standing in the State of Texas.
- 3. I have extensive experience in state and federal trial courts. I also have experience in pharmaceutical litigation. Accordingly, New Mexico UFCW Union's and Employers' Health and Welfare Trust Fund has asked that I serve as co-counsel.

4. Based upon the foregoing, I respectfully request admission to this Court, pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for Southern District and Eastern District of New York, for the purpose of appearing and arguing on behalf of plaintiff, which is represented by the firm, Seeger Weiss LLP.

Art Sadin

Sworn before me this $\underline{6^{th}}$ day of November, 2007

Krista Denise Terrell
My Commission Expires
10/25/2009

STATE BAR OF TEXAS



Office of the Chief Disciplinary Counsel

October 11, 2007

Re: Art Sadin, State Bar Number 17508450

To Whom It May Concern:

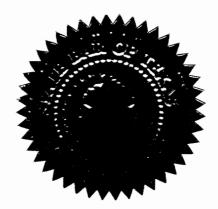
This is to certify that Mr. Art Sadin was licensed to practice law in Texas on May 14, 1982, and is an active member in good standing with the State Bar of Texas. "Good standing" means that the attorney is current on payment of Bar dues and attorney occupation tax; has met Minimum Continuing Legal Education requirements; and is not presently under either administrative or disciplinary suspension.

No previous disciplinary sanctions have been entered against Mr. Sadin's law license.

Sincerely,

Chief Disciplinary Counsel

JN/ss



CERTIFICATE OF SERVICE

I, Christopher A. Seeger, hereby certify that on November 2007, I caused a true and correct copy of the foregoing document, *Motion to Admit Counsel Pro Hac Vice*, to be served via U.S. mail, with proper postage prepaid, on all counsel of record at the following addresses:

Michael Colbert Hartmere, Esq. Matthew Terrence McLaughlin, Esq. VENABLE (NYC) 405 Lexington Ave, 62nd Floor New York, NY 10174 T. (212)-307-5500 F. (212)-307-5598 (fax)

Counsel for defendants Abbott Laboratories, Abbott Laboratories, Inc.

Alexandra Katherine Nellos, Esq.
Donald I. Strauber, Esq.
Phoebe Anne Wilkinson, Esq.
Mary Therese Yelenick, Esq.
CHADBOURNE & PARKE LLP (NY)
30 Rockefeller Plaza
New York, NY 10112
T. (212) 408-5100
F. (646) 710-1189

Counsel for defendants P.F. Laboratories, Inc., Purdue Pharma, Inc., Purdue Pharma, L.P., The Purdue Fredrick Company, Inc., Howard R. Udell, Michael Friedman, Paul D. Goldenheim

Christopher A. Seeger-

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

NEW MEXICO UNITED FOOD AND COMMERCIAL WORKERS UNION'S AND EMPLOYERS' HEALTH AND WELFARE TRUST FUND, on behalf of itself and all others similarly situated,

Civil Action No. 07-cv-6916-JGK

Plaintiff,

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PURDUE PHARMA L.P., PURDUE PHARMA, INC., THE PURDUE FREDERICK COMPANY, INC. d/b/a THE PURDUE FREDERICK COMPANY, P.F. LABORATORIES, INC., ABBOTT LABORATORIES, ABBOTT LABORATORIES, INC., MICHAEL FRIEDMAN, HOWARD R. UDELL, PAUL D. GOLDENHEIM, JOHN DOE Nos. 1 through 20, and JANE DOE Nos. 1 through 20,

ORDER FOR ADMISSION ART SADIN PRO HAC VICE ON WRITTEN MOTION

Defendants.

Upon the motion of Christopher A. Seeger, attorney for New Mexico United Food and Commercial Workers Union's and Employers' Health and Welfare Trust Fund, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that:

Art Sadin Sadin Law Firm, PC 121 Magnolia, Ste. 102 Friendswood, Texas 77546 Telephone: (281) 648-7711 Fax: (281) 648-7799

Email: asadin@sadinlawfirm.com

is admitted to practice *pro hac vice* as counsel for New Mexico United Food and Commercial Workers Union's and Employers' Health and Welfare Trust Fund in the above-captioned case in

Case 1:07-cv-06916-JGK-MHD Document 49 Filed 11/09/2007 Page 10 of 10

the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: November ____, 2007

New York, New York

United States District Court Judge